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MONTANA EIGHTEENTH JUDICIAL DISTRICT COURT
GALLATIN COUNTY

THE STATE OF MONTANA,

Plaintiff,

No. DC-12-_____

v.

RICHARD F. REYNOLDS, a/k/a
RICHARD F. ADKINS

INFORMATION

Defendant.

* * * * *

The State of Montana, having first obtained leave of this Court and by this Information accuses the Defendant with committing the following crimes in Gallatin County, Montana:

COUNT 1: Operating a Pyramid Promotional Scheme (Ponzi Scheme), common scheme, a Felony, in violation of Mont. Code Ann. §§ 30-10-324(6)(b) and 30-10-325, committed on or about May 5, 2009, through on or about August 11, 2011, when the above-named

✱

Defendant willfully conducted, promoted or caused to be conducted or promoted a \$1,020,917.89 Ponzi Scheme involving over 140 investors (See Exhibit A) by making payments to the investors from money obtained from the later investors, rather than from any profits or other income of an underlying or purported underlying business venture.

COUNT 2: Theft by Embezzlement, common scheme, a Felony, in violation of Mont. Code Ann. § 45-6-301(7)(b), committed on or about May 5, 2009, when the above-named Defendant, with the purpose to deprive S.M. (J.F.T.) of S.M.'s money, purposely or knowingly obtained by deception control over S.M.'s money entrusted to the Defendant, in an amount exceeding \$10,000 (See Exhibit A).

COUNT 3: Theft by Embezzlement, common scheme, a Felony, in violation of Mont. Code Ann. § 45-6-301(7)(b), committed on, around, or between August 28, 2009, through the end of October 2009, when the above-named Defendant, with the purpose to deprive P.B., M.F., R.&S.H., R.&B.R., F.P.I., S.K., and L.E. of their money, purposely or knowingly obtained by deception control over their money entrusted to the Defendant, in an amount exceeding \$10,000 (See Exhibit A).

COUNT 4: Theft by Embezzlement, common scheme, a Felony, in violation of Mont. Code Ann. § 45-6-301(7)(b), committed on,

around, or between November 1, 2009, through the end of December 2009, when the above-named Defendant, with the purpose to deprive C.P., D.&D.C., P.H., L.W., and G.T. of their money, purposely or knowingly obtained by deception control over their money entrusted to the Defendant, in an amount exceeding \$10,000 (See Exhibit A).

COUNT 5: Theft by Embezzlement, common scheme, a Felony, in violation of Mont. Code Ann. § 45-6-301(7)(b), committed on, around, or between January 1, 2010, through the end of February 2010, when the above-named Defendant, with the purpose to deprive C.W.H., B.&J.R., S.R., T.S., R.&D.E., J.&K.E., D.&C.S., M.C., R.H., D.&D.C., J.L., T.K., N.W., M.S., T.D., F.H., D.B., W.S., J.T., S.&W.C., and J.&L.C. of their money, purposely or knowingly obtained by deception control over their money entrusted to the Defendant, in an amount exceeding \$10,000 (See Exhibit A).

COUNT 6: Theft by Embezzlement, common scheme, a Felony, in violation of Mont. Code Ann. § 45-6-301(7)(b), committed on, around, or between March 1, 2010, through the end of April 2010, when the above-named Defendant, with the purpose to deprive B.C.R., C.J.M-B., H.S.&H.S.G., A.H., R.&S.H., W.B., R.H., G.&L.H., W.H., R.&D.E., and A.&S.P. of their money, purposely or knowingly obtained by deception control over their money entrusted to the Defendant, in an amount exceeding \$10,000 (See Exhibit A).

COUNT 7: Theft by Embezzlement, common scheme, a Felony, in

violation of Mont. Code Ann. § 45-6-301(7)(b), committed on, around, or between May 1, 2010, through the end of June 2010, when the above-named Defendant, with the purpose to deprive J.H., L.E., D.&C.S., E.B.&D.B., L.&N.B., V.Z., N.D., E.Y., D.&L.T., M.H., F.U., A.H., R.&D.E., Y.B.B.B.B., D.F., J.S.C., R.P., R.&S.H., P.G.M., and D.V. of their money, purposely or knowingly obtained by deception control over their money entrusted to the Defendant, in an amount exceeding \$10,000 (See Exhibit A).

COUNT 8: Theft by Embezzlement, common scheme, a Felony, in violation of Mont. Code Ann. § 45-6-301(7)(b), committed on, around, or between July 1, 2010, through the end of August 2010, when the above-named Defendant, with the purpose to deprive D.M., L.B., E.B.&D.B., P.M., S.M., M.F., K.H.L., M.J.J., S.H.T., J.&L.C., B.F., D.&D.C., J.B.Y., M.H., V.R.M., J.&J.G., and G.H. of their money, purposely or knowingly obtained by deception control over their money entrusted to the Defendant, in an amount exceeding \$10,000 (See Exhibit A).

COUNT 9: Theft by Embezzlement, common scheme, a Felony, in violation of Mont. Code Ann. § 45-6-301(7)(b), committed on, around, or between September 1, 2010, through the end of October 2010, when the above-named Defendant, with the purpose to deprive F.U., T.K., J.&L.C., H.I.T., R.T.D., R.G., J.&J.M., F.C.C., S.V., D.&S.H., R.D.-H., G.K., C.L.A., M.C., D.&L.T., C.R., M.H., A.M.,

J.&J.G., U.I., P.V., F.G., W.&N.B., and E.B.&D.B. of their money, purposely or knowingly obtained by deception control over their money entrusted to the Defendant, in an amount exceeding \$10,000 (See Exhibit A).

COUNT 10: Theft by Embezzlement, common scheme, a Felony, in violation of Mont. Code Ann. § 45-6-301(7)(b), committed on, around, or between November 1, 2010, through the end of December 2010, when the above-named Defendant, with the purpose to deprive M.H., B.D., U.I., J.T.B., M.S., F.C.C., R.T.D., T.K., R.O.I.G.I., P.M., H.M., R.P., H.S.C., A.H., F.U., T.B., B.S., K.F., G.&LA.H., and M.G. of their money, purposely or knowingly obtained by deception control over their money entrusted to the Defendant, in an amount exceeding \$10,000 (See Exhibit A).

COUNT 11: Theft by Embezzlement, common scheme, a Felony, in violation of Mont. Code Ann. § 45-6-301(7)(b), committed on, around, or between January 1, 2011, through the end of February 2011, when the above-named Defendant, with the purpose to deprive T.K., R.O.I.G.I., T.D., J.P., R.P., D.P., J.V., E.B.&D.B., C.S., P.H.R., C.L.III, J.C., and R.T.D. of their money, purposely or knowingly obtained by deception control over their money entrusted to the Defendant, in an amount exceeding \$10,000 (See Exhibit A).

COUNT 12: Theft by Embezzlement, common scheme, a Felony, in violation of Mont. Code Ann. § 45-6-301(7)(b), committed on,

around, or between March 1, 2011, through the end of April 2011, when the above-named Defendant, with the purpose to deprive M.C., J.R.-M., J.B., S.H.Jr, R.O.I.G.I., D.B., R.&S.H., and M.R. of their money, purposely or knowingly obtained by deception control over their money entrusted to the Defendant, in an amount exceeding \$10,000 (See Exhibit A).

COUNT 13: Theft by Embezzlement, common scheme, a Felony, in violation of Mont. Code Ann. § 45-6-301(7)(b), committed on, around, or between May 1, 2011, through the end of June 2011, when the above-named Defendant, with the purpose to deprive R.T.D., E.B.&D.B., R.H., A.&S.P., A.D., S.B., M.D., J.M., D.&C.S., C.T., S.H., W.&D.M., D.B.II, C.G., A.E.V., and J.&J.M. of their money, purposely or knowingly obtained by deception control over their money entrusted to the Defendant, in an amount exceeding \$10,000 (See Exhibit A).

COUNT 14: Theft by Embezzlement, common scheme, a Felony, in violation of Mont. Code Ann. § 45-6-301(7)(b), committed on, around, or between July 1, 2011, through the end of August 2011, when the above-named Defendant, with the purpose to deprive G.F., J.&J.P., B.C.R., R.&S.H., E.K., R.T.D., G.H., P.M., E.Y., V.Z., T.K., S.K., C.E.I., D.&L.T., and D.P. of their money, purposely or knowingly obtained by deception control over their money entrusted to the Defendant, in an amount exceeding \$10,000 (See Exhibit A).

COUNT 15: Failure to Register as a Securities Salesperson, common scheme, a Felony, in violation of Mont. Code Ann. § 30-10-201(1), committed on, around, or between May 1, 2009, through the end of August 2011, when the above-named Defendant acted as a salesperson of a security without being registered with the state of Montana.

COUNT 16: Failure to Register a Security, common scheme, a Felony, in violation of Mont. Code Ann. § 30-10-202(1), committed on, around, or between May 1, 2009, through the end of August 2011, when the above-named Defendant offered an unregistered security to certain investors.


COUNT 17: Fraudulent Practices, common scheme, a Felony, in violation of Mont. Code Ann. § 30-10-301(1)(b), committed on, around, or between May 1, 2009, through the end of December 2009, when the above-named Defendant, while offering the sale of a security, directly and/or indirectly from Montana, made untrue statements of a material fact and/or omitted a material fact which, in light of the circumstances under which they were made, were misleading. Specifically, the Defendant misled the investors by making untrue statements or omitting material facts when he failed to tell them that he was not investing their money and instead was using it for his Ponzi scheme and/or his own personal use.

COUNT 18: Fraudulent Practices, common scheme, a Felony, in violation of Mont. Code Ann. § 30-10-301(1)(b), committed on, around, or between January 1, 2010, through the end of December 2010, when the above-named Defendant, while offering the sale of a security, directly and/or indirectly made untrue statements of a material fact and/or omitted a material fact which, in light of the circumstances under which they were made, were misleading. Specifically, the Defendant misled the investors by making untrue statements or omitting material facts when he failed to tell them that he was not investing their money and instead was using it for his Ponzi scheme and/or his own personal use.


COUNT 19: Fraudulent Practices, common scheme, a Felony, in violation of Mont. Code Ann. § 30-10-301(1)(b), committed on, around, or between January 1, 2011, through the end of August 2011, when the above-named Defendant, while offering the sale of a security, directly and/or indirectly made untrue statements of a material fact and/or omitted a material fact which, in light of the circumstances under which they were made, were misleading. Specifically, the Defendant misled the investors by making untrue statements or omitting material facts when he failed to tell them that he was not investing their money and instead was using it for his Ponzi scheme and/or his own personal use.

COUNT 20: Fraudulent Practices, common scheme, a Felony, in

violation of Mont. Code Ann. § 30-10-301(1)(c) and the Administrative Rules of Montana § 6.10.401(1)(q), committed on, around, or between May 1, 2009, through the end of August 2011, when the above-named Defendant, in connection with the offer, sale, or purchase of a security, directly or indirectly, from Montana, engaged in an act, practice, or course of business that operates or would operate as a fraud or deceit upon the investors. Specifically, the Defendant engaged in an act, practice, or course of business that operated as a fraud or deceit upon the investors by using sales material or sales presentations in a deceptive or misleading fashion.



Marty Lambert
Gallatin County Attorney



By Jesse Laslovich
Special Assistant Attorney General
Special Deputy Gallatin County Attorney

Count 1

A person convicted of Operating a Pyramid Promotional Scheme (Ponzi Scheme) shall be imprisoned in the state prison for a term of not more than 10 years or may be fined an amount not to exceed \$100,000.00, or both.

Counts 2 - 14

A person convicted of the offense of Theft by embezzlement, where the value of the property obtained exceeds \$10,000.00, shall be

imprisoned in the state prison for a term of not less than 1 year or more than 10 years and may be fined an amount not to exceed \$50,000.00.

Count 15

A person convicted of Failure to Register as a Salesperson shall be imprisoned in the state prison for a term of not more than 10 years or may be fined an amount not to exceed \$5,000.00, or both.

Count 16

A person convicted of Failure to Register a Security shall be imprisoned in the state prison for a term of not more than 10 years or may be fined an amount not to exceed \$5,000.00, or both.

Counts 17 - 20

A person convicted of Fraudulent Practices shall be imprisoned in the state prison for a term of not more than 10 years or may be fined an amount not to exceed \$5,000.00, or both.

WITNESSES:

Deputy Montana Commissioner of Securities, Lynne Egan

Investors identified in Exhibit A

C.S.

R.S.

L.W.

R.F.

D.D.

J.H.

Kari Albro

Happy Jack Feder

Sam Scaggs

David Harper

Robert Perry

Charles Hammett

Chris Berglund

Chris Poole

Salvador Lee

Todd Ganovski

EXHIBIT

INVESTOR	DATE OF INVESTMENT	AMOUNT OF INVESTMENT	COUNT 1	COUNTS 2-14
			OPERATING A PYRAMID PROMOTIONAL SCHEME (PONZI SCHEME)	THEFT BY EMBEZZLEMENT
S.M. (T.F.F.)	5-May-09	\$ 35,000.00		\$ 35,000.00
P.B.	28-Aug-09	\$ 2,500.00		\$ 2,500.00
M.F.	28-Aug-09	\$ 10,000.00		\$ 10,000.00
R. & B. R.	6-Oct-09	\$ 15,000.00	\$ 15,000.00	
R. & S. H.	6-Oct-09	\$ 20,000.00		\$ 20,000.00
R. & B. R.	6-Oct-09	\$ 22,500.00		\$ 22,500.00
R. & B. R.	6-Oct-09	\$ 10,000.00		\$ 10,000.00
F.P.I.	13-Oct-09	\$ 10,000.00		\$ 10,000.00
R. & S. H.	13-Oct-09	\$ 80,000.00		\$ 80,000.00
S.K.	13-Oct-09	\$ 50,000.00		\$ 50,000.00
L.E.	20-Oct-09	\$ 10,000.00		\$ 10,000.00
C.P.	6-Nov-09	\$ 75,000.00		\$ 75,000.00
D. & D. C.	12-Dec-09	\$ 43,000.00		\$ 43,000.00
P.H.	14-Dec-09	\$ 10,000.00		\$ 10,000.00
L.W.	18-Dec-09	\$ 25,000.00		\$ 25,000.00
G.H.	31-Dec-09	\$ 10,000.00		\$ 10,000.00
C.W.H.	5-Jan-10	\$ 10,000.00		\$ 10,000.00
B. & J. R.	5-Jan-10	\$ 25,000.00		\$ 25,000.00
S.R.	6-Jan-10	\$ 10,000.00		\$ 10,000.00
T.S.	7-Jan-10	\$ 10,000.00		\$ 10,000.00
R. & D. E.	9-Jan-10	\$ 10,000.00		\$ 10,000.00
J. & K. E.	14-Jan-10	\$ 10,000.00		\$ 10,000.00
D. & C. S.	15-Jan-10	\$ 20,000.00		\$ 20,000.00
M. C.	19-Jan-10	\$ 15,000.00		\$ 15,000.00
R. H.	19-Jan-10	\$ 25,000.00		\$ 25,000.00
D. & D. C.	20-Jan-10	\$ 20,000.00		\$ 20,000.00
J. L.	20-Jan-10	\$ 10,000.00		\$ 10,000.00
T. K.	25-Jan-10	\$ 25,000.00		\$ 25,000.00
N. W.	25-Jan-10	\$ 10,000.00		\$ 10,000.00
M. S.	28-Jan-10	\$ 10,000.00		\$ 10,000.00
T.D.	29-Jan-10	\$ 10,000.00		\$ 10,000.00
F. H.	1-Feb-10	\$ 10,000.00		\$ 10,000.00
D. B.	2-Feb-10	\$ 10,000.00		\$ 10,000.00
W. S.	4-Feb-10	\$ 10,000.00		\$ 10,000.00
J. T.	8-Feb-10	\$ 10,000.00		\$ 10,000.00
S. & W. C.	9-Feb-10	\$ 10,000.00		\$ 10,000.00
J. & L. C.	26-Feb-10	\$ 10,000.00		\$ 10,000.00

INVESTOR	DATE OF INVESTMENT	AMOUNT OF INVESTMENT	COUNT 1	COUNTS 2-14
			OPERATING A PYRAMID PROMOTIONAL SCHEME (PONZI SCHEME)	THEFT BY EMBEZZLEMENT
B. C. R.	2-Mar-10	\$ 10,000.00	\$ 3,558.58	\$ 6,441.42
C. J. M. B. & M.	4-Mar-10	\$ 3,750.00	\$ 675.32	\$ 3,074.68
H. S. & H. S. G.	8-Mar-10	\$ 5,000.00		\$ 5,000.00
A. H.	10-Mar-10	\$ 30,000.00		\$ 30,000.00
R. & S. H.	22-Mar-10	\$ 10,000.00		\$ 10,000.00
W. B. H.	24-Mar-10	\$ 10,000.00		\$ 10,000.00
R. H.	1-Apr-10	\$ 74,000.00		\$ 74,000.00
G. & L. H.	1-Apr-10	\$ 10,000.00		\$ 10,000.00
W. H.	1-Apr-10	\$ 10,000.00		\$ 10,000.00
A. H.	2-Apr-10	\$ 10,000.00		\$ 10,000.00
R. H.	5-Apr-10	\$ 100,000.00	\$ 16,557.60	\$ 83,442.40
R. H.	9-Apr-10	\$ 41,000.00		\$ 41,000.00
R. & D. E.	10-Apr-10	\$ 8,000.00		\$ 8,000.00
A. H.	15-Apr-10	\$ 20,000.00		\$ 20,000.00
A. & S. P.	18-Apr-10	\$ 20,000.00	\$ 1,500.00	\$ 18,500.00
R. & S. H.	21-Apr-10	\$ 63,000.00		\$ 63,000.00
J. H.	3-May-10	\$ 5,000.00		\$ 5,000.00
L. E.	14-May-10	\$ 50,000.00		\$ 50,000.00
D. & C. S.	20-May-10	\$ 15,000.00		\$ 15,000.00
E. B. & D. B.	21-May-10	\$ 10,000.00		\$ 10,000.00
L. & N. B.	21-May-10	\$ 10,000.00		\$ 10,000.00
V. Z.	24-May-10	\$ 5,000.00		\$ 5,000.00
N. D.	26-May-10	\$ 5,000.00		\$ 5,000.00
E. Y.	4-Jun-10	\$ 5,000.00		\$ 5,000.00
E. B. & D. B.	11-Jun-10	\$ 74,000.00	\$ 7,500.00	\$ 66,500.00
D. & L. T.	11-Jun-10	\$ 12,500.00		\$ 12,500.00
M. H.	14-Jun-10	\$ 10,002.00		\$ 10,002.00
F. U.	17-Jun-10	\$ 20,000.00		\$ 20,000.00
A. H.	18-Jun-10	\$ 15,000.00		\$ 15,000.00
R. & D. E.	20-Jun-10	\$ 35,000.00		\$ 35,000.00
Y. B. B. B. B.	21-Jun-10	\$ 2,500.00		\$ 2,500.00
D. F.	21-Jun-10	\$ 5,000.00		\$ 5,000.00
J. S. C.	29-Jun-10	\$ 5,000.00		\$ 5,000.00
L. E.	29-Jun-10	\$ 30,000.00		\$ 30,000.00
R. P.	29-Jun-10	\$ 12,000.00		\$ 12,000.00
R. & S. H.	30-Jun-10	\$ 10,000.00		\$ 10,000.00
P. G. M.	30-Jun-10	\$ 5,000.00		\$ 5,000.00
D. V.	30-Jun-10	\$ 10,000.00		\$ 10,000.00

INVESTOR	DATE OF INVESTMENT	AMOUNT OF INVESTMENT	COUNT 1:	COUNTS 2-14:
			OPERATING A PYRAMID POMOTIONAL SCHEME (PONZI SCHEME)	THEFT BY EMBEZZLEMENT
D. M.	27-Jul-10	\$ 5,000.00		\$ 5,000.00
L. B.	28-Jul-10	\$ 5,000.00		\$ 5,000.00
E. B. & D. B.	29-Jul-10	\$ 8,900.00	\$ 8,900.00	
E. B. & D. B.	29-Jul-10	\$ 10,000.00		\$ 10,000.00
P. M.	13-Jul-10	\$ 5,000.00		\$ 5,000.00
S. M.	15-Jul-10	\$ 10,000.00		\$ 10,000.00
M. P.	23-Jul-10	\$ 10,000.00		\$ 10,000.00
K. H. L.	27-Jul-10	\$ 5,000.00		\$ 5,000.00
M. J. T.	28-Jul-10	\$ 4,982.00	\$ 4,982.00	
S. H. L.	29-Jul-10	\$ 4,982.00	\$ 4,982.00	
K. H. L.	29-Jul-10	\$ 4,985.00	\$ 4,985.00	
B. P.	2-Aug-10	\$ 20,000.00	\$ 15,000.00	\$ 5,000.00
J. B. L. G.	2-Aug-10	\$ 10,000.00		\$ 10,000.00
D. & D. C. T.	19-Aug-10	\$ 40,000.00	\$ 37,966.79	\$ 2,033.21
J. B. V.	17-Aug-10	\$ 5,000.00		\$ 5,000.00
M. H. V.	13-Aug-10	\$ 9,000.00		\$ 9,000.00
V. B. M. V.	16-Aug-10	\$ 10,000.00		\$ 10,000.00
J. B. L. G.	19-Aug-10	\$ 15,000.00	\$ 13,481.50	\$ 1,518.50
G. H.	19-Aug-10	\$ 5,000.00		\$ 5,000.00
F. U.	2-Sep-10	\$ 100,000.00		\$ 100,000.00
T. K.	7-Sep-10	\$ 35,000.00	\$ 20,000.00	\$ 15,000.00
J. & L. C.	8-Sep-10	\$ 25,000.00		\$ 25,000.00
H. I. T.	8-Sep-10	\$ 5,000.00		\$ 5,000.00
R. T. D.	9-Sep-10	\$ 5,000.00		\$ 5,000.00
R. G.	17-Sep-10	\$ 10,000.00		\$ 10,000.00
J. & J. M.	17-Sep-10	\$ 5,000.00		\$ 5,000.00
F. C. C.	20-Sep-10	\$ 3,450.00		\$ 3,450.00
S. V.	20-Sep-10	\$ 5,175.00		\$ 5,175.00
D. & S. H.	21-Sep-10	\$ 35,000.00	\$ 13,166.26	\$ 21,833.74
G. K.	22-Sep-10	\$ 5,000.00	\$ 5,000.00	
R. D. H.	22-Sep-10	\$ 20,000.00	\$ 12,077.87	\$ 7,922.13
C. L. A.	23-Sep-10	\$ 6,500.00	\$ 6,500.00	
D. & L. T.	28-Sep-10	\$ 12,000.00	\$ 4,000.00	\$ 8,000.00
M. C.	28-Sep-10	\$ 65,000.00	\$ 47,678.00	\$ 17,322.00
C. R.	1-Oct-10	\$ 25,000.00		\$ 25,000.00
F. C. C.	5-Oct-10	\$ 2,250.00		\$ 2,250.00
M. H.	6-Oct-10	\$ 500.00		\$ 500.00
A. M.	8-Oct-10	\$ 5,000.00		\$ 5,000.00
J. & J. G.	14-Oct-10	\$ 27,000.00	\$ 20,658.56	\$ 6,341.44
U. I.	18-Oct-10	\$ 60,000.00	\$ 10,000.00	\$ 50,000.00
P. V.	25-Oct-10	\$ 12,000.00		\$ 12,000.00
F. G.	26-Oct-10	\$ 30,000.00	\$ 10,068.46	\$ 19,931.54
E. B. & D. B.	27-Oct-10	\$ 10,000.00	\$ 10,000.00	
W. & N. B.	27-Oct-10	\$ 10,000.00	\$ 8,000.00	\$ 2,000.00

INVESTOR	DATE OF INVESTMENT	AMOUNT OF INVESTMENT	COUNT 1	COUNTS 2-14
			OPERATING A PYRAMID POMOTIONAL SCHEME (PONZI SCHEME)	THEFT BY EMBEZZLEMENT
R. O. I. G. I.	1-Nov-10	\$ 300,000.00	\$ 6,193.98	\$ 293,806.02
B. D.	1-Nov-10	\$ 10,003.00	\$ 1,500.00	\$ 8,503.00
M. H.	1-Nov-10	\$ 26,000.00		\$ 26,000.00
U. M.	3-Nov-10	\$ 7,500.00		\$ 7,500.00
J. T. B.	4-Nov-10	\$ 20,003.00		\$ 20,003.00
M. S.	8-Nov-10	\$ 17,000.00		\$ 17,000.00
F. C. C.	10-Nov-10	\$ 2,550.00		\$ 2,550.00
R. T. D.	16-Nov-10	\$ 10,000.00		\$ 10,000.00
T. K.	16-Nov-10	\$ 50,000.00		\$ 50,000.00
R. O. I. G. I.	19-Nov-10	\$ 400,000.00	\$ 23,000.00	\$ 377,000.00
P. M.	26-Nov-10	\$ 4,000.00		\$ 4,000.00
H. M.	6-Dec-10	\$ 7,000.00		\$ 7,000.00
R. P.	6-Dec-10	\$ 40,000.00		\$ 40,000.00
H. S. C.	9-Dec-10	\$ 10,000.00		\$ 10,000.00
A. H. P.	10-Dec-10	\$ 10,000.00		\$ 10,000.00
F. U.	14-Dec-10	\$ 30,000.00	\$ 5,000.00	\$ 25,000.00
R. O. I. G. I.	17-Dec-10	\$ 250,000.00	\$ 4,199.99	\$ 245,800.01
T. B. S.	17-Dec-10	\$ 5,000.00		\$ 5,000.00
B. S. Y.	24-Dec-10	\$ 10,000.00		\$ 10,000.00
K. J.	27-Dec-10	\$ 10,000.00		\$ 10,000.00
G. & L. A. H.	27-Dec-10	\$ 16,500.00		\$ 16,500.00
M. G.	28-Dec-10	\$ 25,000.00	\$ 17,621.45	\$ 7,378.55
T. K.	29-Dec-10	\$ 20,000.00		\$ 20,000.00
T. K.	5-Jan-11	\$ 20,000.00	\$ 17,000.00	\$ 3,000.00
R. O. I. G. I.	7-Jan-11	\$ 300,000.00	\$ 31,154.18	\$ 268,845.82
T. D.	10-Jan-11	\$ 10,000.00		\$ 10,000.00
J. P.	12-Jan-11	\$ 20,000.00		\$ 20,000.00
R. P.	12-Jan-11	\$ 20,000.00		\$ 20,000.00
D. P.	19-Jan-11	\$ 25,000.00	\$ 3,708.37	\$ 21,291.63
J. V.	21-Jan-11	\$ 5,000.00		\$ 5,000.00
E. B. & D. B.	25-Jan-11	\$ 20,000.00		\$ 20,000.00
C. S.	27-Jan-11	\$ 10,000.00	\$ 1,500.00	\$ 8,500.00
R. P.	27-Jan-11	\$ 10,000.00		\$ 10,000.00
P. H. R.	1-Feb-11	\$ 5,000.00		\$ 5,000.00
C. L. III	8-Feb-11	\$ 20,000.00	\$ 20,000.00	
R. O. I. G. I.	9-Feb-11	\$ 100,000.00	\$ 10,000.00	\$ 90,000.00
J. C.	18-Feb-11	\$ 8,000.00		\$ 8,000.00
R. T. D.	25-Feb-11	\$ 10,000.00		\$ 10,000.00
M. C.	24-Mar-11	\$ 10,000.00		\$ 10,000.00
J. R. M.	24-Mar-11	\$ 40,000.00		\$ 40,000.00
J. B.	8-Apr-11	\$ 10,000.00		\$ 10,000.00
R. O. I. G. I.	15-Apr-11	\$ 200,000.00	\$ 101,500.00	\$ 98,500.00
S. H. Jr.	15-Apr-11	\$ 1,000.00		\$ 1,000.00
D. B.	19-Apr-11	\$ 5,000.00		\$ 5,000.00
M. R.	22-Apr-11	\$ 2,500.00	\$ 2,500.00	
R. & S. H.	22-Apr-11	\$ 20,000.00	\$ 17,500.00	\$ 2,500.00

INVESTOR	DATE OF INVESTMENT	AMOUNT OF INVESTMENT	COUNT 1	COUNTS 2-14
			OPERATING A PYRAMID PROMOTIONAL SCHEME (PONZI SCHEME)	THEFT BY EMBEZZLEMENT
R. T. D.	6-May-11	\$ 10,000.00		\$ 10,000.00
E. B. & D. B.	11-May-11	\$ 25,000.00	\$ 1,500.00	\$ 23,500.00
A. & S. P.	13-May-11	\$ 5,000.00	\$ 5,000.00	
R. H.	13-May-11	\$ 10,000.00	\$ 7,822.22	\$ 2,177.78
A. D.	18-May-11	\$ 10,000.00		\$ 10,000.00
J. M.	20-May-11	\$ 50,000.00	\$ 50,000.00	
M. D.	20-May-11	\$ 80,000.00	\$ 80,000.00	
S. B.	20-May-11	\$ 150,000.00	\$ 12,084.43	\$ 137,915.57
D. & C. S.	23-May-11	\$ 56,000.00	\$ 56,000.00	
C. T.	24-May-11	\$ 75,000.00	\$ 60,000.00	\$ 15,000.00
J. M.	31-May-11	\$ 25,000.00	\$ 20,000.00	\$ 5,000.00
S. H.	1-Jun-11	\$ 30,000.00		\$ 30,000.00
W. & D. M.	6-Jun-11	\$ 50,000.00	\$ 7,691.33	\$ 42,308.67
D. & C. S.	7-Jun-11	\$ 11,234.00	\$ 8,234.00	\$ 3,000.00
D. B. II	10-Jun-11	\$ 20,000.00	\$ 20,000.00	
C. G.	13-Jun-11	\$ 25,000.00	\$ 1,776.00	\$ 23,224.00
R. T. D.	14-Jun-11	\$ 15,000.00		\$ 15,000.00
A. E. V.	16-Jun-11	\$ 9,077.00		\$ 9,077.00
J. & J. M.	20-Jun-11	\$ 15,000.00		\$ 15,000.00
J. & J. M.	28-Jun-11	\$ 10,000.00	\$ 1,500.00	\$ 8,500.00
J & J. M.	29-Jun-11	\$ 10,000.00	\$ 2,500.00	\$ 7,500.00
J & J. M.	12-Jul-11	\$ 25,000.00	\$ 2,410.00	\$ 22,590.00
C. T.	12-Jul-11	\$ 35,000.00	\$ 5,000.00	\$ 30,000.00
B. & C. R.	21-Jul-11	\$ 15,000.00		\$ 15,000.00
E. K.	28-Jul-11	\$ 13,500.00	\$ 7,000.00	\$ 6,500.00
R. & S. H.	28-Jul-11	\$ 75,000.00	\$ 75,000.00	
V. Z.	29-Jul-11	\$ 5,000.00	\$ 5,000.00	
E. V.	29-Jul-11	\$ 5,000.00	\$ 5,000.00	
P. M.	29-Jul-11	\$ 5,000.00	\$ 5,000.00	
G. H.	29-Jul-11	\$ 5,000.00	\$ 5,000.00	
R. T. D.	29-Jul-11	\$ 5,000.00	\$ 5,000.00	
J. K. A.	1-Aug-11	\$ 20,000.00	\$ 17,000.00	\$ 3,000.00
S. K.	3-Aug-11	\$ 36,000.00	\$ 1,084.00	\$ 34,916.00
G. E. H.	8-Aug-11	\$ 15,000.00		\$ 15,000.00
D. & L. T.	10-Aug-11	\$ 20,000.00		\$ 20,000.00
D. P.	11-Aug-11	\$ 75,000.00		\$ 75,000.00
		Total Investment	Total Used in Ponzi Scheme	Total Theft by Embezzlement
		\$ 538,343.00	\$ 1,020,917.89	\$ 436,425.11